

joe@joethomas.org

From: Derek C. Chen <DChen@kbmlawyers.com>
Sent: Monday, October 29, 2018 10:24 AM
To: joe@joethomas.org
Cc: Jayne L. Freeman; LaHoma Walker
Subject: RE: UW/Dalessio - Request to Stay Plaintiff's Second Set of Discovery Requests

Joe,

Let's do Wednesday at 9 am. We would also like to have a court reporter on the call who would take down and transcribe the conversation. The UW is willing to pay for it. Please let us know if you are not agreeable to this for some reason.

The discovery conference will be to again discuss the topics in Plaintiff's Second Set of discovery, which (as we are seemingly in agreement on) have been discussed repeatedly. Now that Defendants' Motion for Summary Judgment is pending, we would like to know exactly which questions Plaintiff believes are necessary to respond to Defendants' SJ motion. If we can come to an agreement about specific responses, we may be able to strike our motion for a protective order if Plaintiff is willing to agree the remaining discovery requests can wait until after the Court rules on the SJ motion. Our positions are laid out in our Motion for a Protective Order.

Thank you.

Sincerely,

Derek Chen

Derek C. Chen
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& McCORMACK

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